

Finley T. Harckham, Esq.
fharckham@andersonkill.com
Peter A. Halprin, Esq.
phalprin@andersonkill.com
Bruce E. Strong, Esq.
bstrong@andersonkill.com
ANDERSON KILL, P.C.
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 278-1000
Facsimile: (212) 278-1733

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

220 COSTER, LLC and B&M LINEN CORP. d/b/a
MIRON & SONS LINEN,

Plaintiffs,

vs.

MASSACHUSETTS BAY INSURANCE
COMPANY,

Defendant.

Index No. 1:14-cv-07027-AJN

**DECLARATION OF PETER A.
HALPRIN, ESQ. IN SUPPORT
OF PLAINTIFFS' MOTION FOR
LEAVE TO FILE FIRST
AMENDED COMPLAINT**

I, Peter A. Halprin, Esq. declare as follows:

1. I am an attorney with the law firm of Anderson Kill, P.C., counsel of record for Plaintiffs 220 Coster, LLC and B&M Linen Corp. in the above-captioned matter. The following is set forth on my own knowledge.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs' proposed First Amended Complaint.

I declare under penalty of perjury under the laws of the United States and the State of New York that the foregoing is true, and that this Declaration was executed on the 12th day of January 2015 in New York, New York.

/s/ Peter A. Halprin

Peter A. Halprin